

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

JOSEPH and JOAN CAPUTO, on behalf of themselves and all others similarly situated,	:	
	:	
	:	C.A. No. 20-cv-1042-CFC
Plaintiffs,	:	
v.	:	
	:	
DEAN VAGNOZZI;	:	
ABetterFinancialPlan.com d/b/a A BETTER	:	
FINANCIAL PLAN;	:	
JOHN W. PAUCIULO; ECKERT	:	
SEAMANS CHERIN & MELLOTT, LLC;	:	
ABFP MANAGEMENT COMPANY, LLC;	:	
ABFP INCOME FUND, LLC;	:	
ABFP INCOME FUND 2, L.P.;	:	
ABFP INCOME FUND 3, LLC;	:	
ABFP INCOME FUND 4; LLC;	:	
ABFP INCOME FUND 5, LLC;	:	
ABFP INCOME FUND 6, LLC;	:	
ABFP INCOME FUND 7, LLC;	:	
ABFP INCOME FUND PARALLEL LLC;	:	
ABFP INCOME FUND 2 PARALLEL LLC;	:	
ABFP INCOME FUND 3 PARALLEL LLC;	:	
ABFP INCOME FUND 4 PARALLEL LLC;	:	
ABFP INCOME FUND 6 PARALLEL LLC;	:	
and ABFP INCOME FUND 7 PARALLEL	:	
LLC,	:	
	:	
Defendants.	:	

NOTICE OF STAY

Ryan K. Stumphauzer, Esquire, as Receiver for A BETTER FINANCIAL PLAN, ABFP
MANAGEMENT CO., LLC, ABFP INCOME FUNDS 1-6, and ABFP INCOME FUNDS 1-6
PARALLEL, named as defendants herein, by and through his counsel Farnan LLP and Pietragallo
Gordon Alfano Bosick & Raspanti, LLP, hereby requests a stay in this matter.

Attached hereto as Exhibit A is an Amended Complaint filed on August 10, 2020, by the
Securities Exchange Commission in the United States District Court for the Southern District of

Florida. (Case No. 9:20-cv-81205-RAR, D.I. 119). On August 11, 2020, the District Court entered an Amended Order Appointing Ryan K. Stumphauzer as Receiver, attached hereto as Exhibit B. (D.I. 141). As set forth in paragraph 32 therein, the United States District Court for the Southern District of Florida has entered a nationwide litigation stay regarding the following proceedings:

All civil legal proceedings of any nature, including, but not limited to, bankruptcy proceedings, arbitration proceedings, foreclosure actions, default proceedings, or other actions of any nature **involving**: (a) the Receiver, in his capacity as Receiver; (b) any Receivership Property, wherever located; **(c) any of the Receivership Entities, including subsidiaries and partnerships; or, (d) any of the Receivership Entities' past or present officers, directors, managers, agents, or general or limited partners sued for, or in connection with, any action taken by them while acting in such capacity of any nature**, whether as plaintiff, defendant, third-party plaintiff, third-party defendant, or otherwise (such proceedings are hereinafter referred to as "Ancillary Proceedings").

Ex. B ¶ 32 (emphasis added).

Defendants A BETTER FINANCIAL PLAN, ABFP MANAGEMENT CO., LLC, ABFP INCOME FUNDS 1-6, and ABFP INCOME FUNDS 1-6 PARALLEL are "Receivership Entities" as defined in Paragraph 1 of the District Court's Amended Order Appointing Receiver. As set forth in paragraph 6 of the Amended Complaint, Defendant Dean Vagnozzi is the principal of A BETTER FINANCIAL PLAN and manages, oversees, and coordinates ABFP MANAGEMENT COMPANY, LLC and the ABFP Income Funds. Ex. A ¶ 6, 7, 22-28. Thus, these entities and Mr. Vagnozzi are subject to the litigation stay entered by the United States District Court for the Southern District of Florida.

Accordingly, the Receiver, through counsel, respectfully requests that this Court enter a litigation stay in the above-captioned matter.

Dated: August 27, 2020

Of Counsel:

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Respectfully submitted,

FARNAN LLP

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as Receiver for Complete Business Solutions
Group, Inc. d/b/a PAR Funding*